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 10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION

13	UNITED STATES OF AMERICA,)	No. C 05-2730 WHA
14	Plaintiff,)	
15	v.)	[PROPOSED] ORDER GRANTING PRELIMINARY INJUNCTION
16	DALE SCOTT HEINEMAN and KURT F.)	[Fed. R. Civ. P. 65; 18 U.S.C. § 1345]
17	JOHNSON, d/b/a THE DOREAN GROUP,)	
18	THE OXFORD TRUST and UNIVERSAL)	
19	TRUST,)	
	Defendants.)	

20 This matter came before the Court on plaintiff's motion for an order preliminarily enjoining
 21 defendants from further violating 18 U.S.C. § 1341 (Mail Fraud), 18 U.S.C. § 1343 (Wire
 22 Fraud), and 18 U.S.C. § 1344 (Bank Fraud) through their "mortgage elimination" program, and
 23 from alienating or disposing of property obtained as a result of said violations, pending final
 24 judgment in this case. Good cause having been shown, the Court GRANTS plaintiff's motion
 25 for a preliminary injunction.

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1 PENDING FINAL JUDGMENT in this case, defendants, their officers, agents, brokers,
2 attorneys and employees are HEREBY RESTRAINED AND ENJOINED from the following:

3 (A) Engaging in any activities related to their mortgage elimination scheme,
4 including:

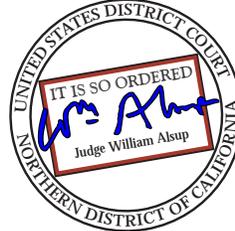
- 5 (1) Advertising their debt elimination services via the Internet, telephone, or
6 any other wire communication, or by mail (whether by commercial carrier
7 or United States Postal Service carrier), to any individual and/or any
8 entity;
- 9 (2) Soliciting or receiving fees from any individual or entity;
- 10 (3) Creating any trusts, or entering any trust agreements;
- 11 (4) Delivering, sending, mailing, or wiring “presentment packets” to lenders,
12 or any documents that purport to appoint themselves as the lender’s agent
13 or attorney-in-fact, or that demand that the lender acquiesce in the scheme;
- 14 (5) Filing or recording any documents with any county clerk, or county
15 recorder’s office, or registers of deeds;
- 16 (6) Receiving proceeds from refinanced loans and/or sale of properties to
17 which defendants have applied their mortgage elimination program;
- 18 (7) Offering, providing, and/or sharing of advice, including but not limited to
19 seminars, tutorials, and conferences, relating in any way to the Dorean
20 Group’s practices.

21 (B) Withdrawing, transferring, removing, dissipating, and disposing of property
22 obtained as a result of its fraudulent conduct, and freezing defendants’ assets that
23 they obtained as a result of the fraud, including funds in the following back
24 accounts:

25 Account No. 03916839
26 Account Name: Lasting Legacy Trust
27 Fremont Bank
32000 Alvarado Boulevard
Union City, California 94587

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Account No. 03916847
Account Name: Cancer-Free Trust
Fremont Bank
32000 Alvarado Boulevard
Union City, California 94587



DATED: August 1, 2005

HON. WILLIAM H. ALSUP
UNITED STATES DISTRICT JUDGE